UNITED STATES DISTRICT COURT DISTRICT OF MONTANA

IN THE MATTER OF THE SEARCH OF 10830 Lost Prairie Road, Marion, MT 59925 Case No. MJ-21- / -M-KLD

ATTACHMENT D

AFFIDAVIT IN SUPPORT OF
APPLICATION
FOR SEARCH WARRANT

I, Thomas S. Hess, being first duly sworn, depose and say:

INTRODUCTION AND AGENT BACKGROUND

1. I am a duly commissioned Special Agent for the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), United States Department of Justice, and have been so employed since September 2013. Previously, I was a Special Agent with the United States Secret Service for approximately five years. I was also a police officer with St. Louis Metropolitan Police Department for approximately three years. I have a Bachelor of Science degree and a Master of Arts and have received approximately 80 weeks of advanced law enforcement training at federal and state academies and seminars. I have conducted numerous investigations involving violations of the Gun Control Act, National Firearms Act, violations of the Controlled Substances Act, and various other firearms and controlled substances violations. I have been involved in all aspects of federal firearms and narcotics investigations, including debriefing defendants, witnesses, and informants, conducting surveillance and undercover operations, and executing search warrants.

2. This affidavit is based upon my personal participation in the investigation described below, my training and experience, my review of records, information received from interviews, and information obtained from other law enforcement officers and investigators. Because this Affidavit is for the limited purpose of establishing probable cause to support the issuance of a search warrant, it contains only a summary of the relevant facts. I have not included each and every fact known to me concerning this investigation.

PURPOSE OF AFFIDAVIT AND PREMISES TO BE SEARCHED

- 3. I, along with others, am currently conducting an investigation regarding the illegal possession of a firearm in violation of the Gun Control Act by Glenn Alan Conner, particularly 18 U.S.C. § 922(g)(8). This Affidavit is made for the limited purpose of establishing probable cause to search Conner's residence, which is located at 10830 Lost Prairie Road, Marion, MT 59925 ("Target Residence"), which is further described in Attachment A, for items that are further identified in Attachment B.
- 4. The Glenn Alan Conner residence is further described as a single-family, three-story house with a wraparound porch with a gable in the approximate center. The residence has a grey metal roof and is wood sided. It has a deck composed of wood polymer. There is a stainless-steel chimney pipe protruding from the roof. The roof also has a dormer above the roofline.

PROBABLE CAUSE

Since assigned to the Missoula, Montana, Satellite Office, Denver Field Division, in August 2018, ATF Special Agent Thomas Hess has received information from various members of law enforcement that Glenn Alan Conner, W/M, DOB: 6/17/1963, SSN: 423-04-3797, FBI: 182729JB1 is prohibited from possessing firearms and ammunition. ATF SA Hess has

received information that Conner is in possession of firearms and ammunition at Target Residence.

- 5. In February 2018, Conner was served with an order of protection immediately following a hearing with a Flathead County Judge or clerk of the court. This order expires on February 12, 2023.
- 6. Conner also is the respondent of an order of protection from Davidson County, North Carolina, that was issued on January 7, 2020. This order was served on Conner on January 8, 2020. The order became final on May 11, 2020. The order was obtained by victim Kelly Holcomb, after Conner abused and threatened Holcomb for a long period of time. Holcomb stated Conner drugged her and made her perform sexual acts that he filmed and photographed. When Holcomb distanced herself from Conner, he emailed these videos and photographs to her work supervisor, co-workers, ex-husband and son.
- 7. Yadkin County Detectives conducted several search warrants to include Conner's Google account. These search warrants uncovered photographs of Conner posing with various firearms. They also showed a supply room, which contains medical supplies, surveillance equipment, and various other survivalist's supplies and items. There is a photograph of this room in which eight long guns, two pistols and two suppressors are hanging on the wall. These photographs were uploaded on or about March 2020 through April 2020. These photographs are contained in Attachment C of this affidavit.
- 8. Conner is currently listed on an ATF Federal Firearms Licensee (9-81-029-01-1H-01909, Expires August 1, 2021) at the address of 10830 Lost Prairie Road, Marion, Montana 59925. This business is listed under Conner Holdings LLC. On January 9, 2020, an ATF representative emailed Conner in reference to two Glock pistols for a trace. On January 9, 2020, Conner responded that both Glock pistols in question were in his possession. Conner further stated he did not have an ATF Form 4473 because these firearms were obtained in a dealer to dealer transfer.

- 9. On April 23, 2020, Conner emailed Holcomb and made various accusations about her, to include that she attempted to "lie and get his guns." Conner frequently contacts Ms. Holcomb with threats or requests for her to return.
- 10. On July 9, 2020, SA Hess spoke with Industry Operations Investigator Lori Schroeder, who stated when an individual applies for a federal firearm license, they are made aware of all prohibiting factors for possessing firearms. This would include orders of protection.
- 11. On July 27, 2020, ATF Industry Operations Investigator Schroeder conducted a Special Outreach Inspection with Federal Firearms Licensee Alan Conner with Conner Holdings LLC, located at 10830 Lost Prairie Road, Marion, Montana. Alan Connor and Crystal Conner are listed as responsible persons. There have not been any changes to the license or responsible persons since they received their license. There haven't been any compliance inspections during the length of this license. The licensee stated his business premises are in his personal dwelling. The licensee didn't have any questions regarding ATF Forms 4473, or Gun Control Act requirements.
- 12. On December 9, 2020, ATF SA Hess interviewed Kelly Holcomb, who stated she had visited the target residence in October 2019. While there, Conner showed her a secret room that was accessed through a closet in the master bathroom. This room contained many elements and items that are consistent with a survivalist. Conner had a large supply of medical supplies and prescription drugs. There was an area set-up and designed to perform surgery. There was a large supply of food and water, including a large quantity of can goods contained in the walls with a designed "slat" to contain them. There were shelves in the center of the room that contained "bulk" storage items that would be needed in an emergency. There was a sophisticated camera monitoring system and radios. There was a large quantity of ammunition stored in dark grey metal cans inside of this room. ATF SA Hess showed Holcomb photographs of the room posted to Google by Conner. Holcomb stated this was the same room she visited, and it was located within the target residence.

- 13. Holcomb also stated that Conner told her about a sniper rifle he had obtained from the military. Conner told her that he kept his "bigger" guns in Montana and that they could not be brought across state lines without a certificate. Conner also stated he had armor-piercing rounds.
- 14. On December 28, 2020, ATF SA Hess inquired with ATF Investigative Analyst (IA) Stephen Feuerstein for further intelligence on CONNER's whereabouts. IA Feuerstein checked several databases and found the most recent address for CONNER as 10830 Lost Prairie, Marion, MT. An address of PO Box 7064, Whitefish, MT also shows up as an address of interest for both Glen Alan CONNER and Crystal CONNER.
- 15. On December 29, 2020, ATF SA Hess received correspondence from Montana Analysis & Technical Information Center (MATIC) Analyst Justin Ewing, who provided several intelligence reports. These reports indicated CONNER's nursing license had expired but his pilot license was still valid. They also indicated CONNER had not paid income taxes in the state of Montana since 2018. The last location CONNER had paid taxes was to the Marion, MT school district. This school is located in close to proximity to CONNER's residence.
- 16. On January 6, 2021, ATF SA Hess and SA Sprenger conducted surveillance at the CONNER residence. SA Sprenger observed a tall, older white male on the property. This description is consistent with Glen Alan CONNER. Also, on that same day, CONNER'S ex-wife Crystal was observed driving into the residence in a white Ford Explorer. The tag on this vehicle is registered to Crystal CONNER. It is unknown if she resides in the house, but all her pertinent information has the target residence listed as her address.
- 17. I know from my training and experiences as an ATF Special Agent, the experience of fellow ATF agents and Task Force Officers, and from my participation in the execution of search warrants authorizing the seizure of firearms, that those who own and possess firearms and ammunition generally maintain them on their person, in their residences and garages, and in their motor vehicles, and in places where they store their personal property. The reason owners of firearms generally maintain and preserve them over a long period of time include the fact that firearms are somewhat expensive, there are, at times, administrative delays in buying them, and firearms do not easily deteriorate. In my experience,

firearms are not depleted through use, nor are they usually exchanged soon after being obtained. Firearms are like expensive tools, which their owners keep and maintain over long periods of time. The reasons owners of firearms generally maintain firearms and ammunition in and about their home or vehicles include the fact that maintenance of them in and about the home or vehicles permits easy access to the firearms, and firearms and ammunition must be maintained in an environment where they will be secure from theft, as well as safe from corrosion.

- 18. I know through my experience and training that in the immediate area where individuals store their firearms and ammunition, there will be evidence of the individual's exercise of dominion and control over the firearm or ammunition. For example, if a firearm or ammunition were stored in a particular dresser drawer, the drawer would also routinely contain items such as documents, cards, letters, photographs, and physical objects such as articles of clothing, which will identify the specific individual or individuals that exercise dominion and control over the particular area.
- 19. Based on the foregoing, I have probable cause to believe that on the premises known as the Glen Alan Conner residence located at 10830 Lost Prairie Road, Marion, Montana, Flathead County, Montana, are firearms, ammunition, records and paperwork reflecting Conner's residency at this Target Residence, which is located in Marion, Montana, all in violation of 18 U.S.C. §§ 922(g)(8).

Thomas S. Hess

Special Agent, ATF

Attested to by the applicant in accordance with the requirements of

Fed. R. Crim P. 4.1 by telephone this 1st day of February, 2021.

United States Magistrate Judge